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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 HUI MA, AILING ZHAO, XI LIU,
22 YIXUAN WANG, and RUI ZHANG,

23 Plaintiffs,

24 v.

25 GOLDEN STATE RENAISSANCE
26 VENTURES, LLC, *dba* Golden Gate
27 Global, a California Limited Liability
28 Company; GSRV MANAGEMENT, LLC,
a California Limited Liability Company;
GSRV-VTI MANAGEMENT, LLC, a
California Limited Liability Company;
ERIC CHELINI, an individual; STEVEN
KAY, an individual; and VERTEBRAL
TECHNOLOGIES, INC., a Minnesota
corporation,

Defendants.

Case No. 3:21-cv-00856-WHO

**DECLARATION OF RUI ZHANG IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTIONS TO COMPEL
ARBITRATION**

Complaint filed: Feb. 3, 2021

Date: May 26, 2021
Time: 2 p.m.
Courtroom: Courtroom 2, 17th fl.
Judge: Hon. William H. Orrick

DECLARATION OF PLAINTIFF RUI ZHANG

1. My name is Rui Zhang. I am one of the Plaintiffs in this action.

我的姓名是张睿。我是本诉讼的原告之一。

2. I am a Chinese national.

我是中国公民。

3. I live in China.

我住在中国。

4. My native language is Chinese.

我的母语是中文。

5. I have very limited English proficiency.

我的英语水平非常有限。

6. In applying to the EB-5 Program and investing in the GSRV-VTI Project, I used and relied on the services of an immigration agency, Strong Union Consulting Ltd./Shurui Gao (“the Agency”).

在申请 EB-5 投资移民并投资 GSRV-VTI 项目时，我使用并依赖了来自移民代理机构 Strong Union Consulting Ltd./Shurui Gao (“代理机构”) 的服务。

7. I received every document that I was asked to sign about the GSRV-VTI Project from the Agency, via email.

我通过电子邮件收到了来自代理机构的要求我签署的所有 GSRV-VTI 项目相关文件。

1 8. I did not receive any contract documents directly from any of the named
2 Defendants.

3 我没有直接从任何一位被告处收到过任何合同文件。

4
5 9. The English version of the Subscription Agreement for GSRV-VTI II, LLC
6 (“**Subscription Agreement**”) is the only complete contract that I received and was told to sign.

7 英文版 GSRV-VTI II, LLC 认购协议（《认购协议》）是我所收到并被告知签署的
8 唯一完整的合同。

9
10 10. I did not receive a complete translation of the Subscription Agreement in Chinese.
11 But the Agency sent me what I understood to be a detailed summary, in Chinese, of the
12 subscription agreement's most important points.

13 我没有收到《认购协议》的完整中文译本。但是，我从代理机构处收到了我认为详
14 细总结了认购协议要点的中文译本。

15
16 11. I did not receive a translation for any other supposed agreements between the
17 Defendants and me.

18 我没有收到其它任何被告与我之间假定协议的中文译本。

19
20 12. Separately, the Agency also sent me several signature pages, with instructions on
21 how to fill them out. And at one point, I recall being asked to send a copy of my signature on a
22 blank page.

23 另外，代理机构还给我发了几张签名页，其中包括如何填写签名页的说明。记得
24 有一次我被要求在空白页上签署我的名字并发给代理机构。

25
26 13. Even after I signed the Subscription Agreement, I was not sent or asked to review
27 a copy of the Operating Agreement for GSRV-VTI II, LLC attached as Exhibit H to Mr. Chelini's
28 declaration (“**Defendants’ Exhibit H**”).

1 即使在我签署了《认购协议》后，我也没有收到或被要求审阅 GSRV-VTI II, LLC
2 的运营协议，详见 Chelini 先生的宣言附录 H（“被告文件附录 H”）。

3
4 14. I do not recognize the contents of Defendants' Exhibit H. As best I can tell, I have
5 never seen this document before.

6 我不知道被告文件附录 H 的内容。我可以说的是，我从未见过此文件。

7
8 15. I was not given a copy of the Operating Agreement for GSRV-VTI II, LLC before
9 I signed the Subscription Agreement.

10 在签署《认购协议》之前，我并没有收到 GSRV-VTI II, LLC 的运营协议副本。

11
12 16. I do not recall signing the Operating Agreement for GSRV-VTI II, LLC.

13 我不记得我签署过 GSRV-VTI II, LLC 的运营协议。

14
15 17. I did not know that the Operating Agreement for GSRV-VTI II, LLC contains a
16 supposed arbitration agreement.

17 我并不知道 GSRV-VTI II, LLC 的运营协议还包含了一个假定的仲裁协议。

18
19 18. I was never told about any “arbitration agreement.”

20 我从来没有被告知有“仲裁协议”。

21
22 19. I did not intend to agree to arbitrate any dispute in connection with my investment
23 in the GSRV-VTI Project.

24 我无意同意就我对 GSRV-VTI 项目投资相关的任何争议进行仲裁。

25
26 20. I did not expect that any agreement between me and any Defendant might contain
27 an agreement to arbitrate disputes in connection with my investment in the GSRV-VTI Project.

1 我没有想到我与任何一位被告之间的任何协议可能包含了我对 GSRV-VTI 项目的投
2 资相关的争议进行仲裁的协议。

3
4 21. My contract with the immigration agency does not contain an arbitration
5 agreement.

6 我与移民代理机构的合同并不包含仲裁协议。

7
8 22. I am not familiar with the U.S. judicial system.

9 我对美国的司法系统并不熟悉。

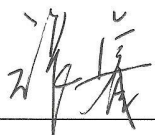
10
11 23. I am not familiar with the "American Arbitration Association" ("AAA"), the AAA
12 rules, or how those rules are different from the rules of this Court.

13 我并不熟悉“美国仲裁协会”（“AAA”），AAA 的规则，以及这些规则如何不同
14 于本法院的规则。

15
16 24. Attached as Exhibit C to the Complaint is a true and correct copy of the material I
17 received concerning the GSRV-VTI Project before investing.

18 诉状的附录 C 是我在投资前收到的 GSRV-VTI 项目文件的真实正确的副本。

19
20
21
22 I declare under penalty of perjury under the law of the United States that the foregoing is
23 true and correct. Executed at Zhuojin Wandai, Xinyin Road 18th, Chaoyang District, Beijing,
24 P.R.C. this 4 day of May, 2021.

25
26 
27 ZHANG Rui

